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Robert L. Olender *
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*not admitted in MD

February 4, 2005

DOCKET FILE COPY ORIGINAL
Counsel
Robert Bennett Lubic*

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals, TW-A325
445 Twelfth Street, S.W.
Washington, DC 20554

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FEB - 4 2005

Federal Communications Commission
Office of Secretary

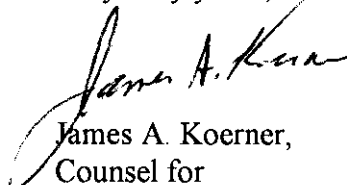
Re: RM-11136

Dear Ms. Dortch:

On behalf of Goodrich Radio, LLC, there are transmitted herewith an original and four (4) copies of its Comments in support of the above-referenced Petition for Rulemaking.

Should additional information be necessary in connection with this matter, please communicate with this office.

Very truly yours,


James A. Koerner,
Counsel for
Goodrich Radio, LLC

Cc: Robert Emmett Goodrich



Before the
Federal Communications Commission
Washington, D.C. 20554

ORIGINAL

RECEIVED

FEB - 4 2005

Federal Communications Commission
Office of Secretary

In the Matter of)
)
Amendment of Section 73.21 and 73.37)
of the Commission's Rules to Provide for Facilities)
Changes by Stations Operating in the Expanded)
AM Band (1605-1705 kHz))
)

RM - 11136

To: Audio Division

COMMENTS OF GOODRICH RADIO, LLC

Goodrich Radio, LLC ("Goodrich"), by its attorneys, hereby submits its comments with respect to the above-captioned Petition for Rulemaking in response to the invitation contained in Public Notice Report No. 2686, released January 5, 2005.

Goodrich is the permittee of Station WDSS, operating on 1680 kHz at Ada, Michigan. Although CDBS lists the status of the station as "CP Off Air," in fact the station has been on the air continuously since March, 1999.

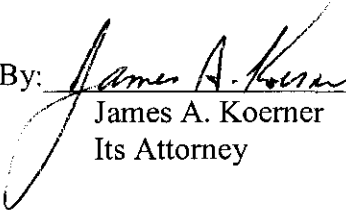
Goodrich fully supports the rule changes proposed in this proceeding. In particular, the ability to operate with a directional antenna would be extremely helpful to WDSS in serving its market. Now that the expanded band has matured, there is no reason to restrict its

inhabitants from utilizing the same engineering techniques taken for granted by stations in the lower band.¹

The Commission should forthwith issue a Notice of Proposed Rulemaking looking toward amendment of the rules as suggested.

Respectfully submitted,

GOODRICH RADIO, LLC

By: _____
James A. Koerner
Its Attorney

February 4, 2005

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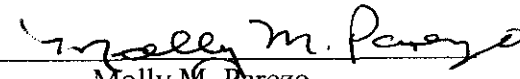
¹ The table attached to the Petition does not indicate how many of the "high interferers" replaced by expanded band stations have been submitted for cancellation, or how many of the originally authorized expanded band authorizations have been returned. That information could be helpful for a full understanding of the effectiveness of the expanded band in reducing interference overall.

CERTIFICATE OF SERVICE

I, Molly M. Parezo, a secretary in the law offices of Koerner & Olender, P.C., do hereby certify that a copy of the foregoing “**Comments of Goodrich Radio, LLC**” was served this 4th day of February, 2005 via first class mail, postage prepaid upon the following:

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Molly M. Parezo